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Attorneys for Plaintiffs

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

BOARD OF TRUSTEES OF THE
TEAMSTERS LOCAL 631 SECURITY
FUND FOR SOUTHERN NEVADA; BOARD
OF TRUSTEES OF THE TEAMSTERS
CONVENTION INDUSTRY TRAINING
FUND

Plaintiffs,

vs.

SHEPARD EXPOSITION SERVICES, INC.,
a Georgia corporation

Defendant.

Case No.:

COMPLAINT

Plaintiffs allege:

1. This action arises under the Employee Retirement Income Security Act of 1974 (“ERISA”), 29 U.S.C. §§ 1001-1500, and the Court has jurisdiction pursuant to 29 U.S.C. § 1132(e).

2. Plaintiffs are the Board of Trustees of the Teamsters Local 631 Security Fund for Southern Nevada and Trustees of the Teamsters Convention Industry Training Fund (“Trust Funds”) and consist of fiduciaries for purposes of ERISA.

7. The CBA, the Trust Agreement, and 29 U.S.C. § 1132(g) provide for assessment of audit fees, court costs, expenses, interest, attorneys' fees and liquidated damages against an employer in the event the employer defaults in making payments to the Trust Funds and legal proceedings are required to recover such payments.

Delinquent Contributions

10. As a result of its delinquency, Shepard is liable to the Trust Funds for unpaid contributions, interest, liquidated damages, audit fees, and attorneys' fees.

1 WHEREFORE, Plaintiffs pray for relief as follows:

2 1. A judgment against Shepard in an amount demonstrated at trial for unpaid
3 contributions, liquidated damages, interest, court costs and attorney's fees as required by ERISA
4 and the Trust Agreement;

5 2. For other equitable relief as provided by ERISA, including but not limited to
6 injunctive relief; and

7 3. For such other and further relief as the Court deems proper.

8 Dated: January 24, 2020

BROWNSTEIN HYATT FARBER SCHRECK, LLP

9 /s/ Christopher M. Humes

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